

ANNETTE SMITH

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1 Q. Do you know if Emily did?

2 A. No.

3 MR. KEMETHER: Thank you. I don't  
4 have anything further.

5 MR. RUSSELL: Few follow up.

6 \* \* \*

7 EXAMINATION

8 BY MR. RUSSELL:

9 Q. The first conversation that you had with  
10 your daughter when she was sent home and you asked  
11 her what happened -- and you may have said this and I  
12 apologize -- but what do you recall about that  
13 initial conversation before your husband said, go  
14 write down some things? What did she tell you  
15 specifically?

16 A. That he was texting her inappropriately.

17 Q. But you don't recall her saying anything  
18 sexual at that time?

19 A. I don't recall. She was -- she was upset.  
20 We were upset. It was kind of a shocking moment  
21 because it's something you see on TV or you hear and  
22 you never think that you're going to be in that  
23 situation. It was like a lot of shock.

24 Q. And then after you went to the police with  
25 your daughter and with your husband, were you all

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1 there together, the three of you?

2 A. That's correct.

3 Q. And you told -- or you heard Emily go  
4 through and say what happened while she was at Faith  
5 Christian and then you also heard that she  
6 testified -- or she indicated that she was  
7 inappropriately touched on her back side. They never  
8 brought charges against Eric Romig relating to  
9 anything associated with your daughter and Eric  
10 Romig, correct?

11 A. The police officer?

12 Q. The police, right. Your daughter was never  
13 part of any prosecution?

14 A. No.

15 Q. And as far as you know, was anyone else  
16 other than Elizabeth Nace -- was anyone else a victim  
17 that you're aware of with regard to Eric Romig?

18 A. Not that I'm aware of.

19 Q. Did you ever thank Mrs. Alderfer for taking  
20 your daughter to Ryan Clymer?

21 A. No.

22 Q. You're glad she did, though, right?

23 A. Yes.

24 Q. And she was a school employee at the time?

25 A. I don't know what she was at the time.

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1 Q. And Mr. Groth asked you about sexual  
2 components of the party and the reason some of that  
3 goes on, is you were asked about rumors about Lauren  
4 Fretz. And rumors can be terrible things, but they  
5 also can be areas that we can inquire and try to find  
6 out if there's any truth or anything to that.

7 One of the aspects that came in some  
8 rumors was that your daughter had exchanged in some  
9 type of oral sex at the party. Does that refresh  
10 your recollection at all as to any allegation against  
11 your daughter?

12 A. No.

13 Q. When she was at the Perkiomen school, the  
14 high school, was there any problems with her sexually  
15 at parties and things like that?

16 A. No.

17 Q. You asked about Ryan -- or wanting a  
18 face-to-face meeting with Ryan Clymer. Did you ever  
19 just show up at the school and request a meeting  
20 or --

21 A. No.

22 Q. And what was -- was there anything that you  
23 hoped to accomplish in the face-to-face meeting that  
24 you weren't able to accomplish via e-mail  
25 communication or over the telephone?

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1 A. I think it's better to have a face-to-face  
2 conversation and it would have given us opportunity  
3 to have a dialogue about the situation, much easier  
4 than over the phone.

5 Q. Was there anything -- other than maybe just  
6 more proper protocol under the circumstances, was  
7 there something that you wanted accomplished in a  
8 face-to-face setting that wasn't accomplished?

9 A. Yeah. I mean, maybe it would have given us  
10 an opportunity to ask questions.

11 Q. Could you ask questions over the phone?

12 A. We could have, but it was such an odd  
13 situation. You know, you can't reach him, oh, I can  
14 call -- we can have this teleconference, you know, at  
15 this certain particular time, you know. It was just  
16 very odd.

17 MR. RUSSELL: I have no further  
18 questions.

19 MS. CONNOR: I don't have any  
20 questions, thank you.

21 \* \* \*

22 EXAMINATION

23 BY MR. SALAZAR:

24 Q. I have one question, ma'am. You testified  
25 earlier that the statement that is attached as the

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1 second page of A. Smith 2, was a -- was written on  
2 December 21st, correct?

3 A. Correct. That's correct.

4 Q. Was there a reason why ten days elapsed  
5 between the date this was written and the date it was  
6 communicated to Mr. Clymer?

7 A. My recollection is when we had that first  
8 telephone call with him, that we said that after the  
9 holidays, you know, we would send him the  
10 documentation and he was going to be out of town. He  
11 wouldn't have access -- I remember him saying he  
12 wouldn't have access to his e-mail. He was not  
13 bringing his computer with him.

14 Q. Did he tell you when he would be returning  
15 from his holiday?

16 A. I just remember after the holidays. I don't  
17 remember if he said specifically.

18 Q. Did he say after New Year's?

19 A. I don't remember, I'm sorry.

20 MR. GROTH: No questions.

21 MS. KERNAN: No questions.

22 MR. KEMETHER: Thank you very much  
23 for your time.

24 (Concluded at 4:33 p.m.)  
25

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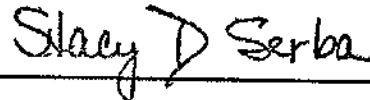
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I hereby certify that the evidence  
and proceedings are contained fully and accurately in  
the notes taken by me of the testimony of the within  
witness who was duly sworn by me, and that this is a  
correct transcript of the same.



Stacy D. Serba

Notary Public

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The foregoing certification does not apply to any  
reproduction of the same by any means unless under  
the direct control and/or supervision of the  
certifying reporter.

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Paul Koehler

Nace vs. Pennridge

November 4, 2015

<p style="text-align: right;">Page 1</p> <p>IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA CIVIL TRIAL DIVISION</p> <p>-----</p> <p>JAMES NACE, et al       : CIVIL ACTION</p> <p>vs.                       :</p> <p>PENNRIDGE SCHOOL DISTRICT,       :</p> <p>et al.                       : NO. 15-333</p> <p>-----</p> <p>Wednesday, November 4, 2015</p> <p>-----</p> <p>On deposition of PAUL KOEHLER, held at the law offices of EASTBURN &amp; GRAY, 60 East Court Street, Doylestown, Pennsylvania, beginning at 1:45 p.m., on the above date, before LANCE A BRUSILOV, Registered Professional Reporter, Approved Reporter for the United States District Court, and Notary Public, there being present.</p> <p>-----</p> <p>brusilow + associates 255 South 17th Street Suite 1500 Philadelphia, PA 19103 215.772.1717 www.brusilow.com</p> <p>-----</p>	<p style="text-align: right;">Page 3</p> <p>(APPEARANCES - CONT'D.)</p> <p>KELLY, GRIMES, PIETRANGELO &amp; VAKIL, P.C. BY: VERONICA N. OLSZEWSKI, ESQUIRE 36 East Second Street Media, PA 19063 ph: 610.565.0600 (volszewski@kgpv.com) Counsel for Ryan Clymer and Russell Hollenbach</p> <p>DRAKE, HILEMAN &amp; DAVIS BY: JONATHAN J. RUSSELL, ESQUIRE 252 W. Swamp Road, #15 Doylestown, PA 18901 ph: 215.348.2088 (jrusell@dhdllaw.com) Counsel for Faith Christian Defendants</p>						
<p style="text-align: right;">Page 2</p> <p>APPEARANCES</p> <p>HORNSTINE PELLONI &amp; HORNSTINE BY: DAVID GROTH, ESQUIRE 1500 Walnut Street Suite 300 Philadelphia, PA 19102 ph: 215.568.4968 (david@hornstine.com) Counsel for Plaintiffs</p> <p>MARSHALL WARNER COLEMAN &amp; GOGGIN BY: DAVID SALAZAR, ESQUIRE 2000 Market Street Suite 2300 Philadelphia, PA 19103 ph: 215.575.2626 (dsalazar@mdwvcc.com) Counsel for Faith Christian Academy</p> <p>EASTBURN &amp; GRAY, P.C. BY: JOANNH D. SOMMER, ESQUIRE BRIN N. KERNAN, ESQUIRE 60 East Court Street Doylestown, PA 18901 ph: 215.345.7000 (jsommer@eastburngray.com) (bkernan@eastburngray.com) Counsel for Pennridge School District and individual Pennridge defendants</p> <p>CASSIDY CONNOR PITCHFORD BY: CARLA E. CONNOR, ESQUIRE 295 East Swedestford Road Suite #346 Wayne, PA 19087 ph: 610.783.3513 (ccconnor@ccpllegal.com) Counsel for FCA, Ryan Clymer and Russell Hollenbach</p>	<p style="text-align: right;">Page 4</p> <p>INDEX</p> <p>WITNESS: PAUL KOEHLER</p> <p>By Mr. Groth                       Page 5 and 115 By Ms. Russel                      Page 86 By Ms. Sommer:                   Page 115</p> <p>EXHIBITS</p> <table border="0"> <thead> <tr> <th>NO.</th> <th>DESCRIPTION</th> <th>PAGE</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Letter dated November 20, 2013</td> <td>110</td> </tr> </tbody> </table>	NO.	DESCRIPTION	PAGE	1	Letter dated November 20, 2013	110
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<p>1 (It is hereby agreed by and among 2 counsel that sealing, certification and 3 filing are waived; and that all objections, 4 except as to the form of the question, are 5 reserved until the time of trial) 6 -----PAUL KOEHLER, having been first 7 duly sworn, was examined and testified as 8 follows: 9 (EXAMINATION) 10 BY MR. GROTH: 11 Q. Good afternoon, Mr. Koehler. My name is 12 David Groth, and I represent the Naces in the 13 lawsuit that's currently pending in Federal 14 District Court in Philadelphia. 15 I'm going to ask you some questions about 16 issues that I think are important to this 17 litigation and your knowledge of facts or 18 information relating to those issues. 19 Have you ever given a deposition before? 20 A. Yes, sir. 21 Q. In what kind of case? 22 A. It was work-related. 23 Q. Work as a . . . 24 A. Outside salesperson. It was a</p>	<p>1 question, for two reasons: Number one, so that you 2 know exactly what I'm asking you because you heard 3 the end of the question before you answered; and 4 number two, the court reporter is making a typed 5 transcript of your testimony, and it's hard to 6 take down two voices speaking over each other. 7 So, if we keep stepping on each other's toes in 8 terms of talking, it's hard to make a transcript. 9 So, I'll try not to interrupt your 10 answer, and please let me finish my sentence 11 before you jump in with an answer, even though you 12 think you understand where I am going with the 13 question. 14 You have to give a verbal response to all 15 questions, no head-shakes yes or head-shakes no, 16 or hand gestures or any other gestures. 17 The court reporter can only take down 18 what's said here, so you have to answer any 19 question with a yes, a no, or a narrative 20 explanation as opposed to a gesture. 21 Please answer every question I ask you 22 fully and to the best of your ability, unless your 23 attorney objects to a question and states a legal 24 basis for the objection and specifically instructs</p>
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<p>1 noncompete -- actually, it was in federal court 2 because it was a noncompete/right-to-work type of 3 going-on. 4 Q. We're going to talk a little bit about 5 your work experience in a second. Let me just 6 give you some guidelines and instructions about 7 depositions that might help us to get through it 8 more efficiently. 9 First of all, make sure you listen to the 10 question that I ask you and make sure you 11 understand the question before you begin an 12 answer. 13 If you don't understand the question, 14 just ask me to rephrase it or restate it or 15 clarify it and I'll be happy to do that for you 16 before you give an answer. 17 If you give an answer to a question, I'll 18 assume that you understood it and that you're 19 giving your best recollection of facts and 20 information going back a number of years back in 21 the 2000s. 22 Please let me complete the question 23 before you begin your answer, and I'll let you 24 complete your answer before I start another</p>	<p>1 you note to answer the question. 2 There may be objections to questions that 3 I ask you where your attorney will still say "I 4 object, but you can answer the question." 5 If that's the case, just answer the 6 question as if there were no objections. The 7 objection has nothing to do with you. It has to 8 do with the attorneys and maybe a judge at some 9 point. 10 I'm going to ask you questions looking 11 for facts and information that you know personally 12 or may have heard or learned from others or gotten 13 through other sources. Hearsay is not an issue in 14 these discovery proceedings as opposed to trial. 15 So, if the information that you have on a 16 certain issue is not something that you knew 17 yourself or developed yourself but something 18 somebody told you, something you heard from 19 somebody else, some information you got from any 20 source other than your own knowledge, you're 21 allowed to tell us that information and tell us 22 who gave you the information and when the 23 information was given and details about the facts 24 or information.</p>

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<p>1 If you don't know the answer to a</p> <p>2 question because you never knew the facts, any of</p> <p>3 the facts, that I'm asking for, just tell me that.</p> <p>4 That's a sufficient answer.</p> <p>5 If you knew facts relating to my question</p> <p>6 but you have forgotten them due to the passage of</p> <p>7 time -- it happened three or four years ago,</p> <p>8 whatever -- and you just don't recall them any</p> <p>9 more, let me know that, and that's a sufficient</p> <p>10 answer as well.</p> <p>11 I don't want you to guess or speculate or</p> <p>12 assume anything in response to a question. Just</p> <p>13 because I ask you a question about something</p> <p>14 doesn't mean that you know the answer to the</p> <p>15 question. I don't know what you know until I</p> <p>16 start asking you the questions. Okay?</p> <p>17 A. Okay.</p> <p>18 Q. But if I do ask you a question and you do</p> <p>19 have knowledge or facts or information regarding</p> <p>20 or responsive to that question, you're required to</p> <p>21 give me all the information that you have.</p> <p>22 Do you understand that this deposition</p> <p>23 today is being taken -- you've taken an oath to</p> <p>24 tell the truth? It's the same as if you were in a</p>	<p>1 So, if the only source of information</p> <p>2 that you have on a certain topic is from one of</p> <p>3 your attorneys, you can tell me that and that will</p> <p>4 be a sufficient answer; you don't have to give me</p> <p>5 the information. But if you got that information</p> <p>6 from some other source outside of your legal.....</p> <p>7 representation, you are required to give me that</p> <p>8 information.</p> <p>9 Finally, if you need to take a break for</p> <p>10 any reason, just let us know -- a bathroom break</p> <p>11 or fresh-air break or whatever you need -- and</p> <p>12 we'll accommodate you if we can.</p> <p>13 Do you understand those instructions?</p> <p>14 A. Yes, I do.</p> <p>15 Q. Mr. Koehler, what's your home address?</p> <p>16 A. 112 Green Street in Sellersville,</p> <p>17 Pennsylvania 18960.</p> <p>18 Q. 18960?</p> <p>19 A. Yes.</p> <p>20 Q. And how long have you lived there? You</p> <p>21 can estimate.</p> <p>22 A. Since 1978.</p> <p>23 Q. In preparation for this deposition today</p> <p>24 did you review any documents?</p>
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<p>1 courtroom testifying in front of a judge and jury.</p> <p>2 Do you understand that?</p> <p>3 A. Yes, sir.</p> <p>4 Q. You can estimate or approximate. Even</p> <p>5 though I don't want you guess or speculate or</p> <p>6 assume anything in response that a question, if I</p> <p>7 ask you things like for a date or a year or a</p> <p>8 distance between objects or whatever, and you</p> <p>9 can't give me a specific answer but you can</p> <p>10 estimate or approximate, that's not a guess.</p> <p>11 That's based on some facts that you know. Just</p> <p>12 tell us you're estimating or approximating.</p> <p>13 If I say what year did something happen</p> <p>14 and you think it was around 2010 or 2012, just</p> <p>15 tell us that and tell us you're estimating or</p> <p>16 approximating.</p> <p>17 Are you feeling okay today? Is there any</p> <p>18 medical or other reason why you couldn't properly</p> <p>19 respond to my questions today?</p> <p>20 A. No.</p> <p>21 Q. Okay. I'm going to ask for information</p> <p>22 from you, but I don't want you to disclose any</p> <p>23 information that you learned from your attorneys.</p> <p>24 There is an attorney-client privilege.</p>	<p>1 A. No.</p> <p>2 Q. There are deposition transcripts of other</p> <p>3 witnesses that have already been taken, including</p> <p>4 Mr. Creeden and Mr. Babb and witnesses from Faith</p> <p>5 Christian Academy. Did you see or review or even</p> <p>6 skim through parts of those deposition</p> <p>7 transcripts?</p> <p>8 A. No, I have not. I haven't seen them.</p> <p>9 Q. Have you seen any exhibits, deposition</p> <p>10 exhibits, that were attached to those deposition</p> <p>11 transcripts? And by that I mean contracts or</p> <p>12 policies from Pennridge or things of that nature.</p> <p>13 A. No.</p> <p>14 Q. Did you review the deposition</p> <p>15 transcript -- and by "review," again I mean</p> <p>16 whether you read the whole thing or skimmed</p> <p>17 through it or just read a section of it -- did you</p> <p>18 review the deposition transcript of Eric Romig?</p> <p>19 A. No.</p> <p>20 Q. Did you talk to anybody about your</p> <p>21 pending or upcoming deposition other than your</p> <p>22 counsel?</p> <p>23 A. Just my two assistant coaches at that</p> <p>24 time.</p>

3 (Pages 9 to 12)

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<p>1 Q. And who are they?</p> <p>2 A. LeeAnn Kramer and Tyler Penhallow.</p> <p>3 Q. Those two individuals are assistants for</p> <p>4 the varsity girls softball team?</p> <p>5 A. Yes.</p> <p>6 Q. Are they coaches for any other team or</p> <p>7 assistant coaches?</p> <p>8 A. For any other teams.</p> <p>9 Q. At Pennridge.</p> <p>10 A. At Pennridge? No.</p> <p>11 Q. What about the Sellersville Belles?</p> <p>12 A. Tyler Penhallow is still an assistant</p> <p>13 with the Sellersville Belles.</p> <p>14 Q. LeeAnn Kramer and Tyler Penhallow have</p> <p>15 been your assistants for a number of years.</p> <p>16 A. Yes.</p> <p>17 Q. When did they start?</p> <p>18 A. My relationship with Tyler is five years</p> <p>19 ago. And with LeeAnn Kramer, she used to play for</p> <p>20 me. But as an assistant coach, five years ago.</p> <p>21 Q. Somewhere around 2010?</p> <p>22 A. Probably.</p> <p>23 Q. And they were your assistant coaches for</p> <p>24 the varsity girls softball team during the entire</p>	<p>1 A. Yes, we took him along as a bench coach.</p> <p>2 And during those weeks of practice he would help</p> <p>3 us during practice.</p> <p>4 Q. And for the season that ended in the late</p> <p>5 spring or early summer of 2013, do you recall if</p> <p>6 the varsity team, the girls varsity team, went to</p> <p>7 the playoffs that year?</p> <p>8 A. I believe that we did.</p> <p>9 Q. Do you recall how deep they went into the</p> <p>10 playoffs?</p> <p>11 A. No, I can't remember that now.</p> <p>12 Q. Do you remember when the last game was,</p> <p>13 the date of the last game?</p> <p>14 A. No.</p> <p>15 Q. Was it in May or June?</p> <p>16 A. I can guess. I can't tell you.</p> <p>17 Q. Can you estimate or approximate?</p> <p>18 A. I can tell you it's probably May because</p> <p>19 we wouldn't have gone -- the state championships</p> <p>20 is always the first week in June. We were not</p> <p>21 close to that.</p> <p>22 Q. Did you speak to either Mr. Babb or Mr.</p> <p>23 Creeden with regard to your deposition today?</p> <p>24 A. No.</p>
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<p>1 time that Eric Romig was a softball coach also at</p> <p>2 Pennridge, correct?</p> <p>3 A. Yes.</p> <p>4 Q. Mr. Romig was the head JV girls softball</p> <p>5 coach, I believe, since the 2012 season. Did he</p> <p>6 have any assistants?</p> <p>7 A. No.</p> <p>8 Q. So, LeeAnn or Tyler would not have acted</p> <p>9 as assistants for him as well?</p> <p>10 A. No.</p> <p>11 Q. But he was always an assistant for you,</p> <p>12 for the varsity team?</p> <p>13 A. Correct.</p> <p>14 Q. For the 2011 and 12, and 2012 and 13</p> <p>15 seasons?</p> <p>16 A. Yes, sir.</p> <p>17 Q. And what did Mr. Romig do as an assistant</p> <p>18 coach for the girls varsity softball team?</p> <p>19 A. He really didn't do anything directly for</p> <p>20 the varsity softball team other than coach our JV</p> <p>21 team.</p> <p>22 Q. If the varsity team went to the playoffs,</p> <p>23 was Mr. Romig part of the team in terms of being</p> <p>24 on the bench?</p>	<p>1 Q. When is the last time you spoke to Eric</p> <p>2 Romig?</p> <p>3 A. Probably a week before he was arrested.</p> <p>4 Q. That would have been September of 2013? (</p> <p>5 think he was arrested on October 1st, 2013. Sound</p> <p>6 about right?</p> <p>7 A. That sounds about right.</p> <p>8 Q. Do you remember what you talked about</p> <p>9 with him that day?</p> <p>10 A. No.</p> <p>11 Q. Let's talk about your educational</p> <p>12 background. Can you tell me what your formal</p> <p>13 education has been starting with high school</p> <p>14 graduation, what year?</p> <p>15 A. I graduated from Pennridge High School in</p> <p>16 1974, and I graduated from Penn State University</p> <p>17 in 1978.</p> <p>18 Q. With a degree in...</p> <p>19 A. Forest Products.</p> <p>20 Q. Any other formal education since then?</p> <p>21 A. No.</p> <p>22 Q. Let's talk about your work experience</p> <p>23 starting with your graduation from Penn State in</p> <p>24 1978. Can you tell me who you worked for, what</p>

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<p>1 careers you worked in, and what your position was?</p> <p>2 A. After graduation from Penn State I was</p> <p>3 employed by Scholl Lumber Company out of</p> <p>4 Bethlehem, Pennsylvania.</p> <p>5 Q. In what position?</p> <p>6 A. I was an outside salesperson.</p> <p>7 Q. After that?</p> <p>8 A. Starting in March of 1982 I went to work</p> <p>9 for a company called Rotanium Products.</p> <p>10 Q. Where are they located?</p> <p>11 A. They are based in Chicago, Illinois.</p> <p>12 Q. In what position?</p> <p>13 A. And I was an outside salesperson.</p> <p>14 Q. Did you still live in the area here?</p> <p>15 A. Still lived in Sellersville, yes.</p> <p>16 Q. After that?</p> <p>17 A. That company was bought nineteen years</p> <p>18 later and I now -- it's now Lawson Products, and I</p> <p>19 have continued in the same position, the same</p> <p>20 territory, for some thirty-three years or whatever</p> <p>21 it is.</p> <p>22 Q. In sales.</p> <p>23 A. Yes, outside sales.</p> <p>24 Q. From like 2001?</p>	<p>1 Q. Again, all in the Sellersville area?</p> <p>2 A. All in the Sellersville area.</p> <p>3 Q. And what were the names of the teams or</p> <p>4 the organizations that you coached for?</p> <p>5 A. Well, in the beginning years I coached at</p> <p>6 Deep Run, so Deep Run's athletic association. I</p> <p>7 coached intramural teams there and a year in the</p> <p>8 all-star team. And then -- twenty-two years ago</p> <p>9 would be...</p> <p>10 Q. 2003?</p> <p>11 A. No.</p> <p>12 Q. 1993?</p> <p>13 A. In 1993 I started the Sellersville</p> <p>14 Fast-Pitch organization.</p> <p>15 Q. You started it?</p> <p>16 A. Yes.</p> <p>17 Q. And you've been the head coach of that</p> <p>18 ever since?</p> <p>19 A. Yes.</p> <p>20 Q. Is there more than one team?</p> <p>21 A. Not today, there is not.</p> <p>22 Q. Was there at one point?</p> <p>23 A. At various times throughout the history</p> <p>24 of the organization, we've had upwards of four</p>
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<p>1 A. Fourteen years ago, yes, from 2001 until</p> <p>2 present with Lawson Products.</p> <p>3 Q. What kind of products do you sell?</p> <p>4 A. Lawson -- we sell consumable maintenance</p> <p>5 hardware.</p> <p>6 Q. Translate.</p> <p>7 A. Nuts and bolts, drill bits.</p> <p>8 Q. Thank you.</p> <p>9 A. If you need anything further, I can't</p> <p>10 figure that one out.</p> <p>11 Q. When did you become involved in coaching?</p> <p>12 A. Coaching. 1978, when I graduated from</p> <p>13 Penn State.</p> <p>14 Q. Where did you coach?</p> <p>15 A. I coached the Pennridge youth wrestling</p> <p>16 program at -- it was a youth wrestling</p> <p>17 organization in the Pennridge community.</p> <p>18 Q. For how long, how many years?</p> <p>19 A. Nine years.</p> <p>20 Q. Any other coaching experience?</p> <p>21 A. And for the past -- well, let's see. For</p> <p>22 the past twenty-five years I've been involved with</p> <p>23 coaching girls fast-pitch softball, which started</p> <p>24 when my oldest daughter was eight years old.</p>	<p>1 teams in different age brackets.</p> <p>2 Q. What are the ages?</p> <p>3 A. Currently we have -- and our focus for</p> <p>4 probably the last fifteen years has been strictly</p> <p>5 in the 18-and-under age bracket.</p> <p>6 Q. Going to how young?</p> <p>7 A. That's it. We typically focus on having</p> <p>8 one team. We have in the past -- in the beginning</p> <p>9 years we had a 12-and-under team, a 14-and-under</p> <p>10 team, and a 16-and-under team. But our focus</p> <p>11 recently, in the last decade, has been the</p> <p>12 18-and-under age bracket.</p> <p>13 Q. But in terms of the youngest somebody can</p> <p>14 be to be on the team, is there an age limit?</p> <p>15 A. No.</p> <p>16 Q. So, if somebody is really good at</p> <p>17 thirteen, they could be on the team?</p> <p>18 A. Absolutely.</p> <p>19 Q. But is it fair to say that most of the</p> <p>20 girls on the team are in high school or late</p> <p>21 middle school?</p> <p>22 A. Right, they're ages fourteen to eighteen.</p> <p>23 Q. Was Eric Romig ever hired as an assistant</p> <p>24 coach for any of the Sellersville Belles teams?</p>

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Appendix 0785

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<p>1 A. Yes.</p> <p>2 Q. When was that?</p> <p>3 A. That was the summer of -- I'm terrible</p> <p>4 with dates, so I can't remember this year that I</p> <p>5 want to forget.</p> <p>6 Q. The summer he was arrested?</p> <p>7 A. Correct, the summer he was arrested.</p> <p>8 Q. Well, he was arrested on October 1.</p> <p>9 A. Yes, so it would have been that summer.</p> <p>10 Q. When did the Belles start practicing or</p> <p>11 playing that summer?</p> <p>12 A. We would have started with tryouts the</p> <p>13 second week in August, and we would have had our</p> <p>14 tryouts throughout the month. We would have had</p> <p>15 eight dates that summer. It would have taken us</p> <p>16 to the last week in August. The teams were then</p> <p>17 picked and then we started practicing after that.</p> <p>18 Q. So, it would be correct to say, then,</p> <p>19 that the Sellersville Belles' season didn't even</p> <p>20 begin, in terms of tryouts, until a couple months</p> <p>21 after Pennridge High School's season was over.</p> <p>22 A. The team that Eric was involved with, the</p> <p>23 Sellersville Belles, that's correct.</p> <p>24 Q. That's what I'm interested in. You may</p>	<p>1 A. I don't know that.</p> <p>2 Q. With regard to the Belles.</p> <p>3 A. Absolutely, yes. He would not have had</p> <p>4 it in the name of the Belles.</p> <p>5 Q. Well, you knew that he had contact with</p> <p>6 her as a JV coach for Pennridge's girls softball</p> <p>7 team, correct?</p> <p>8 A. Absolutely.</p> <p>9 Q. But I was limiting my question just to</p> <p>10 the Sellersville Belles connection.</p> <p>11 A. Correct.</p> <p>12 Q. Maybe I interrupted you when we started</p> <p>13 talking about the Belles, but you've been a</p> <p>14 softball coach at Pennridge for how many years?</p> <p>15 A. I was there for five years.</p> <p>16 Q. Starting?</p> <p>17 A. I guess it would be -- because I'm no</p> <p>18 longer, so that ended in 2015. So, 2010 would</p> <p>19 have been my first year.</p> <p>20 Q. 2010? And you stopped being coach when?</p> <p>21 A. This past spring, 2015.</p> <p>22 Q. Why did you stop coaching there?</p> <p>23 A. They didn't renew my contract.</p> <p>24 Q. Do you know why?</p>
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<p>1 have had other teams that had different schedules.</p> <p>2 A. Right, because our team literally runs</p> <p>3 all year long.</p> <p>4 Q. And the team that Eric Romig was involved</p> <p>5 with, did that have a name, A Team, B Team?</p> <p>6 A. We were calling it the Sellersville</p> <p>7 Belles Showcase Team.</p> <p>8 Q. When did their games actually begin?</p> <p>9 A. They played in the fall. I can't give</p> <p>10 you a date.</p> <p>11 Q. Starting in September?</p> <p>12 A. Late September.</p> <p>13 Q. Was Elizabeth Nace a member of that</p> <p>14 Showcase Team before the summer of 2013?</p> <p>15 A. No, because the team didn't exist.</p> <p>16 Q. Was she a member of any Sellersville</p> <p>17 Belles team before August or September of 2013?</p> <p>18 A. No.</p> <p>19 Q. Was Mr. Romig involved in tryouts for</p> <p>20 that summer showcase team?</p> <p>21 A. Yes.</p> <p>22 Q. So, in terms of Mr. Romig's contact with</p> <p>23 Elizabeth Nace, he wouldn't have any contact with</p> <p>24 her prior to the tryouts in August of 2013.</p>	<p>1 A. What I was told in a meeting was that</p> <p>2 they had unfavorable feedback from players and</p> <p>3 parents on an anonymous year-end survey.</p> <p>4 Q. Unfavorable in what way?</p> <p>5 A. The numbers that were told to me, they</p> <p>6 got thirty-five responses. When asked the</p> <p>7 question would you play for this coach next year,</p> <p>8 they got seventeen no's. They didn't feel that it</p> <p>9 was favorable for me to continue.</p> <p>10 Q. So, you weren't terminated by them. You</p> <p>11 just didn't sign another contract for the next</p> <p>12 season. Is that correct?</p> <p>13 A. That's correct. I think I said my</p> <p>14 contract was not renewed.</p> <p>15 Q. Okay. Have you coached at any other</p> <p>16 school?</p> <p>17 A. No.</p> <p>18 Q. Have you --</p> <p>19 A. Well, that's not true, because I did</p> <p>20 coach for Pennridge as a ninth-grade coach four or</p> <p>21 five years prior to when I coached as a varsity</p> <p>22 coach.</p> <p>23 Q. Softball.</p> <p>24 A. Softball, yes.</p>

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<p>1 Q. Just for one year?</p> <p>2 A. It was for three seasons.</p> <p>3 Q. Three seasons, okay. What team was that?</p> <p>4 A. That was the ninth-grade team at</p> <p>5 Pennridge.</p> <p>6 Q. So, those years would have been like 2005</p> <p>7 to 2008, approximately?</p> <p>8 A. I think it's approximately 1996 to 1999.</p> <p>9 Q. And was there some reason you stopped</p> <p>10 doing that coaching?</p> <p>11 A. My daughter became a senior varsity</p> <p>12 pitcher for Pennridge, and they didn't have enough</p> <p>13 ninth-grade players out, so I said we just need to</p> <p>14 stop this and I'm going to watch my daughter play.</p> <p>15 Q. After your contract was not renewed, did</p> <p>16 you talk to any of the players or parents to find</p> <p>17 out who may have made these complaints or</p> <p>18 unfavorable comments about you and to discuss it</p> <p>19 with any of them at all?</p> <p>20 A. Yes. There are discussions that go on</p> <p>21 because I have several of my high school players</p> <p>22 who play for me in the summer.</p> <p>23 Q. On the Belles.</p> <p>24 A. On the Belles, yes, and that invariably</p>	<p>1 Q. So, like two-thirds of the roster were</p> <p>2 Pennridge players.</p> <p>3 A. But they were split on two teams.</p> <p>4 Q. Right.</p> <p>5 A. Yes.</p> <p>6 Q. Oh.</p> <p>7 A. So, in other words, some of the Pennridge</p> <p>8 girls were on our gold roster and some of the</p> <p>9 girls were playing on the showcase roster.</p> <p>10 Q. So, out of twenty-eight total girls on</p> <p>11 the two teams, about ten of them --</p> <p>12 A. Might have been ten, yes.</p> <p>13 Q. I understand, thank you. Did Elizabeth</p> <p>14 Nace try out for the Belles Showcase Team in</p> <p>15 August of 2013?</p> <p>16 A. Yes.</p> <p>17 Q. Did she make the team?</p> <p>18 A. Yes.</p> <p>19 Q. Did she play for the Belles that season?</p> <p>20 A. Yes.</p> <p>21 Q. And that was her first season for the</p> <p>22 Belles, correct?</p> <p>23 A. Correct.</p> <p>24 Q. Did you know Elizabeth Nace before then?</p>
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<p>1 comes up, you know, about why you're not coming</p> <p>2 back. So, yes, there were discussions about that.</p> <p>3 Q. Were there any discussions with the</p> <p>4 Naces?</p> <p>5 A. No.</p> <p>6 Q. Were there members of the Sellersville</p> <p>7 Belles team that did not come back to play for you</p> <p>8 because they had some unfavorable comments about</p> <p>9 you?</p> <p>10 A. No.</p> <p>11 Q. That they either got from players or</p> <p>12 parents.</p> <p>13 A. No.</p> <p>14 Q. And back in 2013, how many of the Belles</p> <p>15 players were Pennridge softball players, in terms</p> <p>16 of the number or percentage?</p> <p>17 A. I'll give you a guess: That on both of</p> <p>18 our teams, because that fall we would have</p> <p>19 formed -- we had two teams.</p> <p>20 Q. Okay.</p> <p>21 A. (Continuing) -- it will probably be a</p> <p>22 number as high as ten.</p> <p>23 Q. And how many girls are on a team?</p> <p>24 A. Fourteen on a roster.</p>	<p>1 A. Yes.</p> <p>2 Q. How did you know her?</p> <p>3 A. From the high school softball team.</p> <p>4 Q. Pennridge High School.</p> <p>5 A. Yes.</p> <p>6 Q. By the way, I know you gave me your</p> <p>7 employment history, but you've never taught in a</p> <p>8 school?</p> <p>9 A. No.</p> <p>10 Q. Never obtained a teaching certificate?</p> <p>11 A. No.</p> <p>12 Q. So, when you were at Pennridge from 2010</p> <p>13 until your contract was not renewed in 2015, you</p> <p>14 were on the girls softball coach?</p> <p>15 A. Correct -- for Pennridge?</p> <p>16 Q. For Pennridge.</p> <p>17 A. Yes.</p> <p>18 Q. Were you coaching for any other school?</p> <p>19 A. No.</p> <p>20 Q. Were you coaching for any other</p> <p>21 organization other than the Sellersville Belles?</p> <p>22 A. No.</p> <p>23 Q. In the spring and the early summer of</p> <p>24 2013 Elizabeth Nace was finishing up her junior</p>

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<p>1 year as a student at Pennridge.</p> <p>2 Did you have any contact with her during</p> <p>3 that season of her playing for the JV team that</p> <p>4 year?</p> <p>5 A. No, other than at practices: "Hello, Liz.</p> <p>6 Hi."</p> <p>7 Q. You knew her by sight?</p> <p>8 A. And to talk to JV players as a varsity</p> <p>9 coach, right.</p> <p>10 Q. Were there tryouts for the JV team?</p> <p>11 A. You tried out for the high school squad.</p> <p>12 Q. Okay.</p> <p>13 A. And then the best fourteen players or</p> <p>14 thirteen, whatever it may have been that year,</p> <p>15 were varsity players, and the other players that</p> <p>16 would have scored high enough would have been the</p> <p>17 JV players.</p> <p>18 Q. So, there was just a tryout for the</p> <p>19 varsity, and the people who were in the lower</p> <p>20 fourteen were on the JV team.</p> <p>21 A. Correct.</p> <p>22 Q. Who decided whether or not she made the</p> <p>23 twenty-eight?</p> <p>24 A. The coaching staff.</p>	<p>1 form, but you can answer.</p> <p>2 THE WITNESS: Very positive, very</p> <p>3 supportive mom, knew how to do a really good</p> <p>4 scorebook, because I'm real picky about the</p> <p>5 scorebook and it was an excellent scorebook.</p> <p>6 So, a lot of attention to detail</p> <p>7 from that aspect of what went on, and she</p> <p>8 was a mom who kept her mouth shut.</p> <p>9 I don't like parents in dugouts,</p> <p>10 so she conducted herself in a manner that</p> <p>11 was okay with me.</p> <p>12 BY MR. GROTH:</p> <p>13 Q. When you stated something about parents</p> <p>14 in dugouts, you're talking about -- was she in the</p> <p>15 dugout as a scorekeeper?</p> <p>16 A. Yes.</p> <p>17 Q. And there were no other parents in the</p> <p>18 dugout.</p> <p>19 A. No.</p> <p>20 Q. In that 2013 season where Elizabeth Nace</p> <p>21 played for the JV team under Eric Romig in the</p> <p>22 spring and early summer of 2013, was she brought</p> <p>23 up to the varsity team at the end of the year?</p> <p>24 A. I don't remember.</p>
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<p>1 Q. Consisting of?</p> <p>2 A. LeeAnn Kramer, Tyler Penhallow, Eric</p> <p>3 Romig, and myself.</p> <p>4 Q. Did you know anything about her family at</p> <p>5 that time, when she first made the team?</p> <p>6 A. I know her dad had coached softball in</p> <p>7 the local community program.</p> <p>8 Q. James Nace?</p> <p>9 A. Yes.</p> <p>10 Q. How about April Nace? Did you know her at</p> <p>11 all?</p> <p>12 A. No, other than a mom and a scorekeeper.</p> <p>13 Q. What was her function as a scorekeeper?</p> <p>14 What did she do?</p> <p>15 A. Well, she didn't do that until -- for us,</p> <p>16 she didn't actually do that until Elizabeth's</p> <p>17 junior year, when I needed a scorekeeper.</p> <p>18 Q. And she was a scorekeeper for Liz' team?</p> <p>19 A. She kept score for half the season for</p> <p>20 the varsity squad, and she was also keeping score</p> <p>21 for the Sellersville Belles Showcase Team that</p> <p>22 year.</p> <p>23 Q. What was your impression of April Nace?</p> <p>24 MS. SOMMER: Objection to the</p>	<p>1 Q. Was it a custom or practice to bring some</p> <p>2 of the junior varsity players up to the varsity if</p> <p>3 the varsity team made the playoffs?</p> <p>4 A. Yes.</p> <p>5 Q. And do you recall whether or not -- I</p> <p>6 think maybe we talked about this -- whether the</p> <p>7 varsity team made the playoffs in 2013?</p> <p>8 A. Yes.</p> <p>9 Q. They did. Does that refresh your</p> <p>10 recollection at all as to whether or not Elizabeth</p> <p>11 was called up to play on the varsity team?</p> <p>12 A. I can't tell you yes or no.</p> <p>13 Q. It could have happened.</p> <p>14 A. And because she was a pitcher, she could</p> <p>15 have been one of the players that we took along.</p> <p>16 Q. When did you first meet Eric Romig?</p> <p>17 A. I'm going to say March or -- I'm sorry,</p> <p>18 I'll say February -- the year that he was hired by</p> <p>19 the school district.</p> <p>20 Q. So, if he was hired for the 2012 season,</p> <p>21 you're talking about February 2012?</p> <p>22 A. Correct.</p> <p>23 Q. So, the spring season in 2013 would have</p> <p>24 been his second year as a coach.</p>

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<p>1 A. Correct.</p> <p>2 Q. And how did you meet him? Where did you</p> <p>3 meet him?</p> <p>4 A. I physically face-to-face met him for the</p> <p>5 first time at our gym.</p> <p>6 Q. In February of 2013.</p> <p>7 A. Yes.</p> <p>8 Q. Had you talked to him before then on the</p> <p>9 telephone?</p> <p>10 A. Yes.</p> <p>11 Q. Did somebody instruct you to talk to him</p> <p>12 about a coaching position?</p> <p>13 MS. SOMMER: I'm sorry, can we go</p> <p>14 back? Did you say -- was your question --</p> <p>15 would you repeat the question?</p> <p>16 MR. GROTH: It should have been</p> <p>17 2012.</p> <p>18 MS. SOMMER: Yes.</p> <p>19 MR. GROTH: I'm sorry, I gave the</p> <p>20 wrong date.</p> <p>21 BY MR. GROTH:</p> <p>22 Q. You met him at the gym in 2012, in</p> <p>23 February. That was the first year?</p> <p>24 A. Yes.</p>	<p>1 A. I contacted him by email, would he be</p> <p>2 interested in applying for the JV position at</p> <p>3 Pennridge, and he replied no. And then, of course,</p> <p>4 I asked why not? And he said "Because I want to</p> <p>5 run a program."</p> <p>6 I explained to him that the way I run our</p> <p>7 JV program, our JV program needs to prepare our JV</p> <p>8 players to play varsity one day, and he said,</p> <p>9 "Well, that's not what I'm looking for."</p> <p>10 I said, "Fine. After the beginning of</p> <p>11 the year, if you've got nothing, feel free to give</p> <p>12 me a call."</p> <p>13 Q. Okay.</p> <p>14 A. "If we're still looking."</p> <p>15 Q. Let me interrupt you right there: Did</p> <p>16 David Babb tell you that his prior coaching</p> <p>17 experience with Romig at Quakertown was as a</p> <p>18 basketball coach?</p> <p>19 A. No, as a softball coach at Quakertown.</p> <p>20 Q. I'm sorry, okay. What happened after</p> <p>21 that?</p> <p>22 A. After the first of the year I followed up</p> <p>23 because I had not heard anything. We were still</p> <p>24 looking for a JV coach and I sent him a note, an</p>
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<p>1 MR. GROTH: Is that what you were</p> <p>2 asking about?</p> <p>3 MS. SOMMER: Yes.</p> <p>4 BY MR. GROTH:</p> <p>5 Q. Did somebody instruct you to talk to him,</p> <p>6 the athletic director, the principal, whatever,</p> <p>7 about an assistant coaching position?</p> <p>8 A. No one instructed me to contact him, but</p> <p>9 we were looking for a JV coach. It was probably in</p> <p>10 November of the -- I guess it would be now 2011.</p> <p>11 David Babb had contacted me and said "I</p> <p>12 got a contact by Eric Romig, former high school</p> <p>13 coach at Quakertown, looking for a coaching</p> <p>14 position in softball. He was looking for any</p> <p>15 coaching job," and that's what David had told me.</p> <p>16 I told him that we didn't have a -- we</p> <p>17 didn't need a head coach, but that I would pass</p> <p>18 the information on to you if you wanted to contact</p> <p>19 him. So, I contacted him in November --</p> <p>20 Q. By phone?</p> <p>21 A. -- by phone, yes, and asked him if he</p> <p>22 would be interested in -- do you know what? Not by</p> <p>23 phone. It was by email. It was by email.</p> <p>24 Q. Okay.</p>	<p>1 email, and he said, "Well, maybe I'll come out.</p> <p>2 I'd like to come out to an open gym and see what</p> <p>3 you've got going on, what's happening."</p> <p>4 Q. All right.</p> <p>5 A. So, that's when I first met him. He came</p> <p>6 to one of our open gyms to see what Tyler, LeeAnn</p> <p>7 and myself were doing with our players who would</p> <p>8 be out in an open gym.</p> <p>9 Q. For practice?</p> <p>10 A. Yes, a voluntary, unplanned practice.</p> <p>11 Q. Does the PIAA know about that?</p> <p>12 A. For the PIAA officials who might be in</p> <p>13 the room.</p> <p>14 Q. When you spoke to Mr. Romig first or</p> <p>15 emailed him in November 2011, was there also a</p> <p>16 follow-up telephone conversation where you talked</p> <p>17 about "There is no head coaching position</p> <p>18 available, but I need somebody as an assistant to</p> <p>19 run the varsity program"?</p> <p>20 A. I don't know if it was via phone or</p> <p>21 email.</p> <p>22 Q. Okay. You think you had some</p> <p>23 back-and-forth with him where he said he wanted to</p> <p>24 run his own program.</p>

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<p>1 A. Correct.</p> <p>2 Q. Did he tell you during any of those</p> <p>3 discussions, whether by email or telephone, that</p> <p>4 he had actually run the varsity girls basketball</p> <p>5 program at Faith Christian Academy for a number of</p> <p>6 years?</p> <p>7 A. No.</p> <p>8 Q. Did you know from any source of</p> <p>9 information, Mr. Romig or anybody else, that he</p> <p>10 had coached from, I think, approximately 2005 to</p> <p>11 2009 at Faith Christian Academy as a head</p> <p>12 basketball coach?</p> <p>13 A. No.</p> <p>14 Q. Did you ask him if he had any other</p> <p>15 coaching experience other than his coaching</p> <p>16 experience at Quakertown?</p> <p>17 A. No.</p> <p>18 Q. When you first met Mr. Romig at the open</p> <p>19 gym in February of 2012, did he tell you that he</p> <p>20 had been a coach for -- a head basketball coach,</p> <p>21 varsity basketball coach, for a number of years at</p> <p>22 Faith Christian Academy?</p> <p>23 A. No.</p> <p>24 Q. Did you ask him about his coaching</p>	<p>1 Q. Did you ask him why he wasn't coaching?</p> <p>2 A. No.</p> <p>3 Q. What happened after this meeting with Mr.</p> <p>4 Romig at the open gym in February of 2012?</p> <p>5 A. He said, "Look, I'll think it over. I'll</p> <p>6 give you a call."</p> <p>7 Q. And?</p> <p>8 A. A couple of days later he called me and</p> <p>9 said "I really like what you're doing. I'd like</p> <p>10 to be involved in the program. If you still need</p> <p>11 a JV coach, I'd love to fill the position."</p> <p>12 I told him that David Babb was the guy</p> <p>13 who makes those final decisions, "but go ahead and</p> <p>14 talk to him."</p> <p>15 Q. Did he do that, to the best of your</p> <p>16 knowledge?</p> <p>17 A. To the best of my knowledge, he did.</p> <p>18 Q. Did you do any formal, in-person</p> <p>19 interview with Mr. Romig for the JV position?</p> <p>20 A. No.</p> <p>21 Q. Do you know if Mr. Babb did?</p> <p>22 A. No.</p> <p>23 Q. No, he didn't or --</p> <p>24 A. I don't know.</p>
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<p>1 experience, either at Quakertown or anywhere else</p> <p>2 he may have coached?</p> <p>3 A. At Quakertown.</p> <p>4 Q. You already knew that from David Babb.</p> <p>5 A. I knew that from David Babb. I also</p> <p>6 recalled that because I followed Pennridge</p> <p>7 softball and knew coaches in this area.</p> <p>8 So, we briefly talked about the fact</p> <p>9 that, as he would say, his claim to fame was that</p> <p>10 Quakertown beat CB South the year they were state</p> <p>11 champions.</p> <p>12 Q. Do you recall asking him if he had any</p> <p>13 other coaching experience other than Quakertown?</p> <p>14 A. No.</p> <p>15 Q. Did you ask him why he stopped coaching</p> <p>16 at Quakertown?</p> <p>17 A. No.</p> <p>18 Q. Did you know that he had not coached at</p> <p>19 Quakertown since sometime in 2009 or early 2010?</p> <p>20 A. Wasn't aware of the date.</p> <p>21 Q. Were you aware that he wasn't coaching</p> <p>22 anywhere for a number of years before he was</p> <p>23 looking into this Pennridge position?</p> <p>24 A. Yes.</p>	<p>1 Q. Did Mr. Babb consult with you before</p> <p>2 deciding to extend an offer to Mr. Romig?</p> <p>3 A. I don't know that -- I can't recall if we</p> <p>4 had an exact conversation about it.</p> <p>5 Q. But you did direct Mr. Romig to talk to</p> <p>6 Mr. Babb about the position --</p> <p>7 A. Correct.</p> <p>8 Q. -- and sometime after that Mr. Babb</p> <p>9 offered the position and Mr. Romig accepted,</p> <p>10 correct?</p> <p>11 A. Yes.</p> <p>12 Q. Before any contract was signed by Mr.</p> <p>13 Romig, did Mr. Babb or Principal Creeden ask you</p> <p>14 to conduct any type of background investigation</p> <p>15 into Mr. Romig?</p> <p>16 And by that I mean checking out any of</p> <p>17 his references or contacting any prior supervisors</p> <p>18 who were his superiors when he was coaching</p> <p>19 someplace, or anything of that nature at all?</p> <p>20 A. No.</p> <p>21 Q. Did they ask you to get involved in the</p> <p>22 hiring process in any way?</p> <p>23 A. No.</p> <p>24 Q. Have you ever been asked by David Babb or</p>

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Appendix 0790



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<p>1 Tom Creeden to do that for any of the assistant 2 coaches in softball? 3 A. No. 4 Q. Assistant coaches LeeAnn and Tyler, were 5 they hired at the time that you were the head 6 coach? 7 A. Yes. 8 Q. And what was the process that LeeAnn went 9 through to get hired as an assistant coach to your 10 program? 11 A. I knew she had to fill out -- have all 12 her background checks done, had to sign a 13 contract. I think she was -- that's all that I 14 know. 15 Q. Did you do anything to vet her, to check 16 with her references, to check about or ask her 17 about her prior coaching experience or anything of 18 that nature? 19 A. No. I knew LeeAnn for eight years. She 20 played for me. I followed her through college. I 21 know that she was a grad assistant at Pitt 22 Bradford, where she played, and that it was my 23 desire to have a female assistant coach involved 24 with our varsity program because, as a male, there</p>	<p>1 a female assistant, or would you sometimes do that 2 yourself? 3 A. I don't know that I would stop and go 4 "Oh, here, LeeAnn, you come do this." It happens 5 when it happens. It happens in the moment; you 6 know, a team situation. So, I don't know that we 7 would intentionally stop and switch off to someone 8 else. 9 Q. So, you might do it yourself? 10 A. Yes. 11 Q. Tyler Penhallow may do it himself? 12 A. Correct. 13 Q. Eric Romig, you would expect, would have 14 done it with his JV team girls. 15 A. Correct. 16 Q. Back in 2013 were you cognizant, as 17 somebody who has coached first wrestling and then 18 girls fast-pitch softball for a number of years, 19 of reports in the media, whether it be the 20 television or newspapers or whatever, of incidents 21 of coaches getting physically sexually involved 22 with players, female players? 23 A. Probably every week. 24 Q. And how would you become aware of that</p>
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<p>1 are those situations where girls get hurt or 2 whatever and it's better handled by a female than 3 a male. 4 Q. And by "handle," you mean in case there 5 is any physical contact, that type of thing. 6 A. Exactly. 7 Q. Is there physical contact between coaches 8 or assistant coaches and girls softball players in 9 terms of training and instructions: How to hit 10 the ball; how to throw the ball; what position to 11 be in; how to turn your body a certain way? Is 12 there hands-on type coaching that has to go on? 13 A. For the most part, no. But on occasion, 14 if a girl just doesn't get it, if she's just not 15 getting into a position that you need her to be 16 in, it's sometimes best to just physically move a 17 knee or rotate a hip to give her the sense of 18 what's going on. 19 Q. So, in the coaching process, the normal 20 coaching process for girls softball, there could 21 be some hands-on instruction on how to do certain 22 things as a softball player. 23 A. Yes. 24 Q. Would you leave those types of things to</p>	<p>1 type of thing? 2 A. On the TV, see it in a newspaper. It 3 happened. It appears -- it just happens. 4 Q. In your coaching experience, has anything 5 like that ever happened to a team that you were 6 involved with, with any assistant coaches or any 7 players, female players? 8 A. One time. 9 Q. What was that? 10 A. Mr. Eric Romig. 11 Q. Did you happen to see a newspaper article 12 in The Inquirer within the last year where they 13 had the names, faces and accounts of coaches in 14 the Philadelphia area, male coaches, having 15 inappropriate sexual relationships with female 16 players? 17 A. No. 18 Q. Mr. Romig being one of them? You don't 19 recall seeing that article? 20 A. No. 21 Q. During your time as a head coach of girls 22 fast-pitch softball at Pennridge -- and you 23 haven't coached any other sport of Pennridge, 24 correct?</p>

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<p>1 A. No.</p> <p>2 Q. (Continuing) -- during your time as a</p> <p>3 girls fast-pitch softball coach, did you ever</p> <p>4 receive any training or instruction, either</p> <p>5 in-service in the school by school employees or</p> <p>6 administrators or from some outside person brought</p> <p>7 in to train, about sexual abuse and harassment</p> <p>8 issues?</p> <p>9 A. No.</p> <p>10 Q. Never?</p> <p>11 A. No.</p> <p>12 Q. Not from David Babb?</p> <p>13 A. No.</p> <p>14 Q. Not from Mr. Creeden?</p> <p>15 A. No.</p> <p>16 Q. Not from Ray Scarpantonio?</p> <p>17 A. Don't even know who he is.</p> <p>18 Q. Were you ever invited to any training or</p> <p>19 instruction sessions dealing with the topic of the</p> <p>20 recognition of and reporting of suspected sexual</p> <p>21 harassment or abuse of female players?</p> <p>22 A. No.</p> <p>23 Q. Were you ever given any training or</p> <p>24 instruction with regard to -- at Pennridge; not</p>	<p>1 policy, practice or procedure at Pennridge that</p> <p>2 described what sexual harassment was and what was</p> <p>3 to be done if you knew or suspected or had</p> <p>4 reasonable cause to believe that there was some</p> <p>5 sexually inappropriate activity going on between a</p> <p>6 coach and a player?</p> <p>7 A. I will tell you the only thing that I was</p> <p>8 given by Pennridge was a coach's binder that</p> <p>9 stated the policies and everything from picking a</p> <p>10 team and informing players to fund-raising.</p> <p>11 To my recollection, I will tell you I did</p> <p>12 not read it cover-to-cover and I do not recall</p> <p>13 having seen any of that in there. Was it there?</p> <p>14 I'm not sure of that.</p> <p>15 Q. Was there only one binder given to you</p> <p>16 when you first started coaching, or did you get a</p> <p>17 new one every year?</p> <p>18 A. Yes, the beginning of the year I -- when</p> <p>19 I was first hired I was given the binder.</p> <p>20 Q. No subsequent binders after that.</p> <p>21 A. No.</p> <p>22 Q. Do you still have that binder?</p> <p>23 A. Yes.</p> <p>24 Q. Can you turn that over to your attorneys,</p>
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<p>1 anything outside Pennridge, but Pennridge -- any</p> <p>2 training or instruction with regard to the</p> <p>3 mandatory-reporting provisions of the Pennsylvania</p> <p>4 Child Protective Services Law?</p> <p>5 A. No.</p> <p>6 Q. Have you ever heard of the Pennsylvania</p> <p>7 Child Protective Services Law?</p> <p>8 A. No.</p> <p>9 Q. Do you know what a mandatory reporter is?</p> <p>10 A. No.</p> <p>11 Q. Do you know, back in 2010 through the end</p> <p>12 of 2014, when your contract was not renewed by</p> <p>13 Pennridge, were you considered to be a mandatory</p> <p>14 reporter? Did anybody ever tell you that?</p> <p>15 A. No.</p> <p>16 Q. That if you suspected -- not that you</p> <p>17 knew; not that you had proof; not that you saw it</p> <p>18 with your own eyes, that you just suspected that</p> <p>19 there may have been some inappropriate contact or</p> <p>20 conduct between a coach and a student -- that you</p> <p>21 were required to report it to somebody at</p> <p>22 Pennridge?</p> <p>23 A. No.</p> <p>24 Q. Were you ever given a written copy of any</p>	<p>1 please, and I'll request it from them?</p> <p>2 A. Sure.</p> <p>3 Q. And that would be for the year 2010 going</p> <p>4 up until the end of 2014, correct?</p> <p>5 A. Yes.</p> <p>6 Q. What I'm specifically asking you about is</p> <p>7 whether or not you were given any written material</p> <p>8 by Pennridge, whether it was in the coaches binder</p> <p>9 or handbook -- some people refer to it as a</p> <p>10 handbook or whatever -- or in any other fashion</p> <p>11 that dealt with the topic of unlawful harassment</p> <p>12 and actually gave a definition of sexual</p> <p>13 harassment as contained on the second page of the</p> <p>14 document I'm showing you.</p> <p>15 I'm showing you the Pennridge School</p> <p>16 District Professional Employees Policy on Unlawful</p> <p>17 Harassment, policy number 448, revised June 21st,</p> <p>18 2004.</p> <p>19 You don't have to read the whole thing,</p> <p>20 but I just want to know whether you have ever seen</p> <p>21 that document or a similar document from Pennridge</p> <p>22 before.</p> <p>23 A. Are you asking me if I've ever seen this</p> <p>24 or if I believe I've ever seen this?</p>

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<p>1 Q. Yes.</p> <p>2 A. I don't believe I've ever seen this.</p> <p>3 Q. And on the second page there is a section</p> <p>4 that actually, I think, defines the term sexual</p> <p>5 harassment.</p> <p>6 A. Yes.</p> <p>7 Q. Did you ever see that policy in any</p> <p>8 written form during your four years or five years</p> <p>9 at Pennridge?</p> <p>10 A. Not to the best of my recollection.</p> <p>11 Q. And nobody from Pennridge or somebody</p> <p>12 Pennridge hired ever came to you and tried to</p> <p>13 instruct you or teach you about the reporting of</p> <p>14 sexual harassment.</p> <p>15 A. Correct, no.</p> <p>16 Q. Do you know whether or not anybody at</p> <p>17 Pennridge ever trained or instructed your</p> <p>18 assistant coaches with regard to the issue of</p> <p>19 sexual harassment or abuse?</p> <p>20 A. Someone from Pennridge?</p> <p>21 Q. Yes.</p> <p>22 A. No.</p> <p>23 Q. Do you know if somebody outside of</p> <p>24 Pennridge ever did that?</p>	<p>1 Q. And why was that?</p> <p>2 A. Because in today's world of litigation</p> <p>3 and things and accusations and things that can go</p> <p>4 on, I just did not want my coaching staff to be</p> <p>5 put in a situation where it was one-on-one and one</p> <p>6 person's word against another.</p> <p>7 Q. He said/she said.</p> <p>8 A. Correct.</p> <p>9 Q. Was there any policy that Pennridge, the</p> <p>10 school district, gave to you regarding texting</p> <p>11 between coaches and players?</p> <p>12 A. No.</p> <p>13 Q. Did you have your own policy with regard</p> <p>14 to texting between coaches and players?</p> <p>15 A. No.</p> <p>16 Q. Was there any prohibition of Tyler</p> <p>17 Penhallow or Eric Romig texting their own players</p> <p>18 or players that they were coaching about change of</p> <p>19 practice times, cancellation of games due to rain,</p> <p>20 anything like that?</p> <p>21 A. What was the question? I'm sorry.</p> <p>22 Q. Were there texts that were sent by you or</p> <p>23 your assistant coaches to the female players on</p> <p>24 the Pennridge teams, JV or varsity, regarding</p>
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<p>1 A. The only discussions that ever went on --</p> <p>2 and it was at the beginning of each season -- I</p> <p>3 would meet with our coaches.</p> <p>4 Q. Just your coaches.</p> <p>5 A. Just our coaches.</p> <p>6 Q. Not all --</p> <p>7 A. Just the softball program, so that we</p> <p>8 could plan what we were going to do, how we were</p> <p>9 going to approach the tryouts, etcetera, etcetera.</p> <p>10 And Paul Koehler's discussion and</p> <p>11 instruction to my assistant coaches were -- and</p> <p>12 then of course we also passed this on to our</p> <p>13 parents -- that we will not leave a player at a</p> <p>14 field by herself; we as coaches will not by</p> <p>15 ourselves stay with a player; that there will</p> <p>16 always be two of us; and that we as coaches,</p> <p>17 unless there are two of us, we will never offer a</p> <p>18 girl a ride home, will not do anything that would</p> <p>19 put a one-on-one situation between a player and a</p> <p>20 coach.</p> <p>21 Q. Is that just the player and a male coach</p> <p>22 or even --</p> <p>23 A. Player and male or female coach. It did</p> <p>24 not matter.</p>	<p>1 things such as change in practice time or</p> <p>2 cancellation of games due to rain or anything like</p> <p>3 that? Sports related.</p> <p>4 A. I can only speak for myself. My</p> <p>5 assistants Tyler or LeeAnn would have not done it,</p> <p>6 to the best of my knowledge.</p> <p>7 Q. Why?</p> <p>8 A. Because it wasn't their job.</p> <p>9 Q. Whose job was it?</p> <p>10 A. It would have been my job to communicate</p> <p>11 that.</p> <p>12 Q. Okay.</p> <p>13 A. Information that Eric would have passed</p> <p>14 on to his team would have been his job to pass</p> <p>15 that on. I would have only texted or communicated</p> <p>16 with a captain of our team, and that was typically</p> <p>17 about practices. But if a game was cancelled and</p> <p>18 it was announced at school, there was no real</p> <p>19 reason for me to text a player to say a game was</p> <p>20 cancelled.</p> <p>21 Q. Did you ever have occasion to text your</p> <p>22 players?</p> <p>23 A. I would have texted a captain about make</p> <p>24 sure girls are ready for practice tomorrow, but it</p>

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<p>1 was very, very minimal.</p> <p>2 Q. Was that on purpose?</p> <p>3 A. On purpose.</p> <p>4 Q. What was the reason?</p> <p>5 A. Because I don't want people -- a</p> <p>6 59-year-old male does not need to be texting</p> <p>7 16-year-old girls.</p> <p>8 Q. Had you heard of situations -- when you</p> <p>9 said that you saw in the media almost weekly</p> <p>10 reports of coaches having inappropriate physical</p> <p>11 contact with female athletes, did you hear or read</p> <p>12 or of know of stories of coaches who were</p> <p>13 inappropriately texting females that they were</p> <p>14 coaching?</p> <p>15 And by "inappropriate" I mean about</p> <p>16 sexual things and things of that nature.</p> <p>17 A. I can't recall that.</p> <p>18 Q. Okay. Did you instruct Eric Romig -- he</p> <p>19 was an assistant coach under you, correct?</p> <p>20 A. Correct.</p> <p>21 Q. (Continuing) -- did you instruct him not</p> <p>22 to text any of those female players on the team?</p> <p>23 A. No.</p> <p>24 Q. Before he was arrested did you know</p>	<p>1 students who he was coaching?</p> <p>2 A. Prior to his arrest?</p> <p>3 Q. Prior to his arrest.</p> <p>4 A. No.</p> <p>5 Q. Now, you had pretty limited contact with</p> <p>6 Elizabeth Nace prior to Mr. Romig's arrest, --</p> <p>7 correct?</p> <p>8 A. Correct.</p> <p>9 Q. In fact, the only direct contact you</p> <p>10 would have with her as a player would have been</p> <p>11 when she came up to the varsity team at the end of</p> <p>12 her junior year from the JV team.</p> <p>13 A. Would have been her. . .</p> <p>14 Q. That would have been --</p> <p>15 A. . . sophomore year.</p> <p>16 Q. -- her sophomore year, okay?</p> <p>17 A. Yes.</p> <p>18 Q. What were your impressions of Elizabeth</p> <p>19 Nace as a player, as a person?</p> <p>20 A. She was a pitcher, so she was very</p> <p>21 hard-working, very focused, never seemed to get</p> <p>22 rattled based on things that went on.</p> <p>23 Q. To outward appearance?</p> <p>24 A. Correct. She was just very calm, level,</p>
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<p>1 whether or not he was texting any female players</p> <p>2 on the Pennridge JV team?</p> <p>3 A. No.</p> <p>4 Q. If you had known that he was, would you</p> <p>5 have objected to that?</p> <p>6 A. I would have recommended that he did not.</p> <p>7 Q. Would have you recommended that he maybe</p> <p>8 just text like the captain of the team and have</p> <p>9 that person text everybody else?</p> <p>10 A. Yes.</p> <p>11 Q. Was there ever a situation where you</p> <p>12 texted or any of your assistant coaches texted any</p> <p>13 female player on your teams about</p> <p>14 non-sports-related activities, personal</p> <p>15 information, personal activities having nothing to</p> <p>16 do with the girls fast-pitch softball teams?</p> <p>17 A. No.</p> <p>18 Q. Did you know prior to Mr. Romig getting</p> <p>19 arrested on October 1st, 2013 that he was texting</p> <p>20 Elizabeth Nace thousands of times about</p> <p>21 non-sports-related issues?</p> <p>22 A. No.</p> <p>23 Q. Did anybody ever give you any information</p> <p>24 about Mr. Romig's texting practices to his</p>	<p>1 never an up or a down. So, that would have been</p> <p>2 what I would have remembered of her.</p> <p>3 Q. Was that unusual for somebody that you</p> <p>4 coached of her age?</p> <p>5 A. If you've ever coached teenage females,</p> <p>6 drama is a favorite. So, a squad of fourteen</p> <p>7 girls, there is a lot of drama that goes on. Liz</p> <p>8 was not a drama queen, not someone involved in</p> <p>9 that type of behavior.</p> <p>10 Q. Was she a tough competitor?</p> <p>11 A. Very competitive.</p> <p>12 Q. In terms of her size, especially compared</p> <p>13 to other pitchers, was she large or small, right</p> <p>14 in the middle?</p> <p>15 A. Small.</p> <p>16 Q. Small.</p> <p>17 A. Yes.</p> <p>18 Q. What do you believe her height and weight</p> <p>19 to be back in 2013?</p> <p>20 A. Do we get in trouble for guessing weights</p> <p>21 of girls?</p> <p>22 Q. When they're fifteen, probably not.</p> <p>23 A. She can't have been 115 pounds if she was</p> <p>24 carrying 35-pound weights in her pockets, and</p>

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Appendix 0794



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<p>1 maybe five foot four.</p> <p>2 Q. Did she ever have any outbursts of</p> <p>3 emotion?</p> <p>4 A. Never.</p> <p>5 Q. Very controlled. Very -- you said</p> <p>6 focused before?</p> <p>7 A. Uh-huh.</p> <p>8 Q. Yes?</p> <p>9 A. Yes. I'm sorry.</p> <p>10 Q. What about if she wasn't doing well or if</p> <p>11 she was, you know, not pitching well or the team</p> <p>12 was losing? How did she comport herself in those</p> <p>13 situations?</p> <p>14 A. There is no difference. She was the</p> <p>15 same.</p> <p>16 Q. Was there else, any other girl on the</p> <p>17 team, who was like that?</p> <p>18 A. I can't attest to yes or no.</p> <p>19 Q. They're all different in a certain</p> <p>20 respect. I understand that.</p> <p>21 A. Yes.</p> <p>22 Q. Did she seem to you to be mature beyond</p> <p>23 her age, how she handled things in the competitive</p> <p>24 atmosphere and in terms of how she was doing as an</p>	<p>1 A. Within one game.</p> <p>2 Q. Right, no one would pitch the whole game.</p> <p>3 A. I didn't view that I would have a pitcher</p> <p>4 who would be that dominant. In Liz' senior year</p> <p>5 especially, Liz ended up being the pitcher.</p> <p>6 Q. For your team?</p> <p>7 A. For our team. She was the shut-town</p> <p>8 person. When we needed a top performance, she was</p> <p>9 the one who ended up being the performer.</p> <p>10 Q. And this was after Eric Romig's arrest.</p> <p>11 A. Correct.</p> <p>12 Q. And did she pitch complete games</p> <p>13 sometimes?</p> <p>14 A. Yes.</p> <p>15 Q. Was she on the varsity or junior year as</p> <p>16 well, or just her senior year?</p> <p>17 A. Her junior year as well.</p> <p>18 Q. Did you notice any differences in her as</p> <p>19 a player, as a competitor, as a student athlete,</p> <p>20 between the time or after the time Eric Romig was</p> <p>21 arrested and before he was arrested?</p> <p>22 A. I really can't compare the before and the</p> <p>23 after because I didn't see her play all that --</p> <p>24 she played JV for us.</p>
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<p>1 athlete?</p> <p>2 A. Yes, because my oldest daughter was also</p> <p>3 a pitcher and was physically very different than</p> <p>4 what Liz was, but mentally and the way she</p> <p>5 approached the game, they were both very similar.</p> <p>6 So, like I said, she didn't act like a</p> <p>7 fourteen- or a fifteen-year-old. She acted like</p> <p>8 she was a seasoned veteran, although she wasn't.</p> <p>9 Q. And she didn't have the physical</p> <p>10 attributes that a lot of other pitchers have in</p> <p>11 terms of size and weight and strength, that type</p> <p>12 of thing?</p> <p>13 A. Correct.</p> <p>14 Q. But she still managed to compete?</p> <p>15 A. Correct.</p> <p>16 Q. Was she a pitcher? I mean, if you had to</p> <p>17 compare her to others in her league, on her team</p> <p>18 or whatever, in her junior and senior years.</p> <p>19 A. Well, her senior career -- I'll refer to</p> <p>20 the paper, but I believe she was second-team</p> <p>21 all-league as a pitcher. We went into both her</p> <p>22 junior and senior years expecting to use a</p> <p>23 committee of pitchers.</p> <p>24 Q. Within one game?</p>	<p>1 Q. Right.</p> <p>2 A. So, I really can't comment on the</p> <p>3 difference between her sophomore year and her</p> <p>4 junior year.</p> <p>5 Q. Did you ever discuss her situation with</p> <p>6 Eric Romig with her?</p> <p>7 A. Did I ever discuss. . .</p> <p>8 Q. Yes. After Eric Romig was arrested and</p> <p>9 she played softball for the varsity team, did you</p> <p>10 discuss her situation with Mr. Romig at all?</p> <p>11 A. Until I got a letter, email, requesting</p> <p>12 that I come for -- informing me of a lawsuit,</p> <p>13 officially I was never informed that Elizabeth</p> <p>14 Nace was in fact the player involved with Eric</p> <p>15 Romig.</p> <p>16 Q. How about unofficially?</p> <p>17 A. Not even unofficially. Just by conjecture</p> <p>18 and the word on the street.</p> <p>19 Q. Word on the street from other players,</p> <p>20 parents of players, that type of thing?</p> <p>21 A. Yes, yes, and yes.</p> <p>22 Q. Other coaches in the school? Other</p> <p>23 administrators in the school?</p> <p>24 A. No, it would not have come from anybody</p>

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<p>1 from school. So, to answer your original 2 question, I never discussed it with her. 3 Q. He was arrested, Mr. Romig, on October 4 1st, 2013, so she would have been playing for the 5 varsity team starting in March of 2014. 6 A. Correct. 7 Q. And certainly by that time you had heard 8 through the grapevine, through whatever sources 9 you had, that she was the person that was the 10 victim of Mr. Romig's sexual's misconduct. 11 A. Correct. 12 Q. During that period of time, between the 13 time Mr. Romig was arrested and the time she 14 started playing for you in 2014 in the springtime, 15 did you have any conversations about her or her 16 relationship with Mr. Romig with the principal, 17 Mr. Creeden? 18 A. No. 19 Q. Did you have any conversations with the 20 athletic director, David Babb? 21 A. No. 22 Q. Did they give you any direction or 23 instruction or guidance or any help at all in how 24 you should handle the situation with her as a</p>	<p>1 A. I believe I sought her out. 2 Q. And you weren't sent to her by David Babb 3 or Thomas Creeden? 4 A. Correct. 5 -Q- Other than you seeking out the guidance 6 counselor, Ms. O'Connor, to talk about the 7 situation, did anybody from the administration at 8 Pennridge offer you any type of guidance, support, 9 help, information on how to deal with one of your 10 players who was a victim of sexual abuse? 11 A. No. 12 Q. Do you know, other than the guidance 13 counselor -- 14 A. Let me clarify that: No, but it was a -- 15 how do I say this? We can't get involved. You 16 can't discuss this with the player. You can't ask 17 her to do things, talk to her team about it. 18 In other words, told me what I shouldn't 19 do than how I could deal with it. 20 Q. Did the guidance counselor give you any 21 guidance that you as a coach could benefit from on 22 how to treat or how to deal with a victim of 23 sexual abuse on your team, even without talking to 24 the victim herself, but what you as a coach could</p>
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<p>1 coach? 2 A. No. 3 Q. Did they send you to see any guidance 4 counselor in the school to say that "A member" -- 5 even without giving a name -- "a member of your 6 team has been the subject and victim of sexual 7 abuse by a coach who coached under you. This is 8 the way you should handle things that you might 9 want to do as a coach with that player"? 10 A. I was given the name of the guidance 11 counselor who was having meetings, discussions 12 with players, the team, as this whole thing 13 unfolded in that fall. 14 I was also able to talk to her in the 15 spring as we came into the season about -- and she 16 just continued to inform me that the players are 17 very mature about that; they're handling it very 18 well; that things are going very well. So, that's 19 all I knew of it. 20 Q. Who was that? 21 A. O'Connor, last name O'Connor. Her name 22 flies out of my mind right now. 23 Q. And did you seek her out or did she come 24 to talk to you about Elizabeth Nace?</p>	<p>1 do or should be doing to help that player along in 2 her athletic pursuits? 3 A. No. 4 Q. Was there any special arrangement made to 5 ensure that, for example, Tyler Penhallow was not 6 alone with Elizabeth Nace for any period of time 7 or for any reason? 8 A. No. 9 Q. Or you yourself. 10 A. No. 11 Q. Did you talk to the detectives that 12 investigated Mr. Romig's conduct, the Bucks County 13 detectives? 14 A. No. 15 Q. They never asked you for an interview? 16 A. Never. 17 Q. Do you know if they interviewed any of 18 your assistant coaches? 19 A. No. 20 MR. RUSSELL: No, you don't 21 know -- 22 THE WITNESS: I do not know that, 23 no. 24</p>

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<p>1 BY MR. GROTH:</p> <p>2 Q. Your assistant coaches never told you</p> <p>3 that they were interviewed by the detectives.</p> <p>4 A. Correct, they did not. To the best of my</p> <p>5 knowledge, they were never interviewed.</p> <p>6 Q. Did it ever come to your attention from</p> <p>7 any source that girls on the varsity softball team</p> <p>8 were speaking in front of Mr. Romig about</p> <p>9 attractions they had to male teachers in the</p> <p>10 school or coaches in the school and having some</p> <p>11 kind of sexual relationship with them?</p> <p>12 Did anybody ever come to you and report</p> <p>13 to you that that type of conversation was taking</p> <p>14 place among your varsity female athletes?</p> <p>15 A. No.</p> <p>16 Q. Mr. Romig never came to tell you that he</p> <p>17 had overheard or been present when girls from the</p> <p>18 varsity team were making those kind of statements</p> <p>19 and comments, did he?</p> <p>20 A. Never.</p> <p>21 Q. And your own assistant coaches never told</p> <p>22 you that they had overheard the varsity girl</p> <p>23 players making those kind of comments.</p> <p>24 A. No.</p>	<p>1 Q. Okay. Did you discuss with your assistant</p> <p>2 coaches Mr. Romig's arrest and the accusations or</p> <p>3 allegations against him shortly after this came to</p> <p>4 light?</p> <p>5 A. Absolutely.</p> <p>6 Q. Did you ask them whether or not they had</p> <p>7 seen anything, heard anything, knew anything,</p> <p>8 suspected anything regarding Mr. Romig's conduct</p> <p>9 with any of the female softball players at</p> <p>10 Pennridge?</p> <p>11 A. Yes.</p> <p>12 Q. And what did they say?</p> <p>13 A. Nothing. They were shocked, as I was.</p> <p>14 Q. Do you know whether or not your assistant</p> <p>15 coaches had any conversation with the girls</p> <p>16 softball players about Mr. Romig's conduct after</p> <p>17 he was arrested?</p> <p>18 In other words, whether your assistant</p> <p>19 coaches went to the girls on the softball team and</p> <p>20 said did you hear anything, know anything, suspect</p> <p>21 anything?</p> <p>22 A. No.</p> <p>23 Q. You don't know if that ever happened?</p> <p>24 A. I don't know if that ever happened.</p>
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<p>1 Q. Did your own assistant coaches tell you</p> <p>2 that Eric Romig had told them that he had been</p> <p>3 present when the varsity girls were talking about</p> <p>4 being attracted to and having some kind of sexual</p> <p>5 relationship with teachers or coaches at the</p> <p>6 school?</p> <p>7 A. No.</p> <p>8 Q. If they had been told that by Mr. Romig,</p> <p>9 who was the JV coach, would that be something that</p> <p>10 you would expect your own coaches, assistant</p> <p>11 coaches, to tell you about?</p> <p>12 MS. SOMMER: Objection to the</p> <p>13 form. You can answer.</p> <p>14 A. I would hope they would have.</p> <p>15 Q. Were the assistant coaches given copies</p> <p>16 of the coach's binder or handbook that you're</p> <p>17 referring to?</p> <p>18 A. No.</p> <p>19 Q. Just the head coaches were.</p> <p>20 A. Yes.</p> <p>21 Q. And you don't believe there was anything</p> <p>22 in the binder about a sexual harassment policy at</p> <p>23 the school, correct?</p> <p>24 A. Not that I can recall.</p>	<p>1 Q. You did not do that, correct?</p> <p>2 A. No.</p> <p>3 Q. Was there any effort at Pennridge that</p> <p>4 you're aware of, Pennridge High School, to try to</p> <p>5 determine whether or not Elizabeth Nace was the</p> <p>6 only victim of Mr. Romig's sexual abuse at</p> <p>7 Pennridge?</p> <p>8 A. Repeat again? I'm sorry.</p> <p>9 Q. Sure. Was there anybody at Pennridge</p> <p>10 High School that made any effort, to your</p> <p>11 knowledge, to determine whether or not Elizabeth</p> <p>12 Nace was Eric Romig's only victim, sexual abuse</p> <p>13 victim, at Pennridge High School?</p> <p>14 A. No.</p> <p>15 Q. Do you know whether the county detectives</p> <p>16 or the DA's Office made any effort to do that?</p> <p>17 A. No.</p> <p>18 Q. When you said the guidance counselor came</p> <p>19 in to meet with the players on the team after Mr.</p> <p>20 Romig's arrest, who was at that meeting beside the</p> <p>21 players? Were you there?</p> <p>22 A. No. I was not involved in any of the</p> <p>23 meetings, nor were any of my assistant coaches.</p> <p>24 Q. That was my next question. This was just</p>

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<p>1 the players, female players, and the guidance 2 counselor. 3 A. My understanding is just the players and 4 the female guidance counselor. 5 Q. Was it your understanding or impression 6 that within a relatively short period of time the 7 rest of the girls on the softball team, varsity 8 and JV knew who the person was that Mr. Romig 9 victimized? 10 A. That would be my assumption, yes. 11 Q. What kind of reaction did the players 12 have to Elizabeth Nace when she came back to play 13 softball after Mr. Romig's arrest? 14 A. If you came to our practice or you came 15 to a game, you would have seen none. They 16 practiced and played as though nothing had 17 happened. 18 Q. Was there ever a reaction -- comment, 19 statements, heckling or whatever -- from others 20 outside the community at any of the games that 21 Elizabeth Nace participated in? 22 A. Never. 23 Q. You never heard anyone yell out something 24 about "Hey, you're the one with the coach" or</p>	<p>1 A. No. 2 Q. Do you know whether or not he ever 3 applied or was asked to apply for the position of 4 the head girls basketball coach at Pennridge after 5 he came there as an assistant softball coach? 6 A. No. 7 Q. Mr. Romig was hired by Pennridge to coach 8 in the 2012 JV girls softball season, then he 9 signed another contract for the 2013 season. 10 Did you sign that contract on behalf of 11 Mr. Romig? 12 A. I can't say that. I don't know. 13 Q. Do you recall if you contacted Mr. Romig 14 to say "You've got to sign this contract" and he 15 said "I don't want to come in" or whatever, "would 16 you sign it for me"? 17 A. No. 18 Q. I'm showing you Creeden-2. It's the 19 first contract Mr. Romig signed with Pennridge. 20 It has a signature of Mr. Romig here. 21 A. Okay. 22 Q. Actually, there is no date on that, but 23 that was for the 2011/12 season. 24 A. Okay.</p>
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<p>1 anything like that? 2 A. No. 3 Q. Did you at some point learn, after Mr. 4 Romig was hired at Pennridge, that he had had a 5 coaching position as the head basketball coach at 6 FCA from approximately 2005 until the end of 2009? 7 A. Not until after his arrest. 8 Q. Not until after 2013, October 1st? 9 A. I did not know until after he was 10 arrested. 11 Q. Did Mr. Babb ever come to you in 2012 or 12 in 2013, before Mr. Romig's arrest, and tell you 13 that he had gotten information from Russell 14 Hollenbach, the athletic director at FCA, that 15 Eric Romig left there because of a texting problem 16 while he was basketball coach at FCA? 17 A. No. 18 Q. Did Mr. Creeden ever come and give you 19 that information? 20 A. No. 21 Q. When Mr. Romig was the assistant varsity 22 coach under you, did he ever mention to you before 23 he was arrested that he had in fact coached at FCA 24 as the head girls basketball coach?</p>	<p>1 Q. The second contract -- by the way, the 2 first contract has a Bates number of 22851. The 3 second contract for the 2012/13 season is 4 Bates-numbered 22852. There is Mr. Romig's 5 signature again. 6 Do you see that, between the two, it's 7 nowhere near the same? 8 A. I agree. 9 Q. Is that your handwriting? 10 A. No. 11 Q. It's not your handwriting. 12 A. No. 13 Q. So, if Mr. Romig testified in his 14 deposition that you signed that contract for him, 15 you don't have a recollection of doing that. 16 A. He's mistaken. 17 Q. Okay. 18 MR. RUSSELL: What was the Bates 19 number on that again? 20 MS. SOMMER: 22851 and 22852. 21 BY MR. GROTH: 22 Q. Prior to Mr. Romig's arrest, did Mr. 23 Romig present any type of behavioral, professional 24 or any type of problem to you as his head coach</p>

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<p>1 during the two seasons that he coached at 2 Pennridge? 3 A. None whatsoever. 4 Q. You never had to reprimand him about 5 anything or correct something that he was doing 6 wrong, in your opinion, anything like that at all? 7 A. Nothing. 8 Q. Mr. Koehler, as part of the pretrial 9 discovery process, the attorneys have to identify 10 potential witnesses and tell each other what those 11 witnesses have information about. 12 And Pennridge's attorneys identified you 13 as a potential witness with knowledge of 14 information relevant to the litigation, and it 15 says this, that this is the information that you 16 have: "Facts and documentation relating to Mr. 17 Romig's employment by Pennridge School District 18 and the Sellersville Belles, and the termination 19 of employment with Pennridge School District." 20 We've talked about your conversations 21 with Mr. Romig and the hiring process, when he was 22 first hired, back in 2011/2012. 23 Do you have any documentation about any 24 of his hiring? Do you keep any records yourself?</p>	<p>1 Q. But this also says you have information 2 "regarding contact with Faith Christian 3 representatives prior to and during the course of 4 Romig's employment with Pennridge." 5 Do you have any facts or information 6 regarding Mr. Romig's coaching activities at Faith 7 Christian Academy that you learned prior to the 8 date of his arrest? 9 A. None. 10 Q. After Mr. Romig was arrested, did you 11 ever have an opportunity or occasion to discuss 12 Elizabeth Nace's situation with her parents? 13 A. No. 14 Q. Did Elizabeth Nace's parents ask you for 15 any special treatment of their daughter, or to do 16 or not do certain things in terms of your coaching 17 of her after Mr. Romig was arrested? 18 A. None. 19 Q. Was Elizabeth Nace still the scorekeeper 20 for you? 21 A. She was for half of our varsity season, 22 Liz' junior year. 23 Q. And why did she stop? Do you know? 24 A. Because there were complaints about Coach</p>
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<p>1 A. No. 2 Q. Other than the things that we've 3 discussed already -- your conversation with him or 4 email to him, and his meeting you at the gym and 5 whatever -- are there any other facts regarding 6 his hiring by Pennridge that we have not 7 discussed that you had direct knowledge of? 8 A. No. 9 Q. It also says that you have facts relating 10 to the investigation of Romig's background prior 11 to hiring by Pennridge School District. 12 Do you have any facts relating to the 13 investigation of Romig's background prior to his 14 hiring by Pennridge? 15 A. No. 16 Q. And it says "and contact with Quakertown 17 School District and Faith Christian 18 representatives prior to and during the course of 19 Romig's employment with Pennridge." 20 I'm interested in the Faith Christian 21 part of that. You already testified that you knew 22 from David Babb that he had hired him and coached 23 under Babb at Quakertown, correct? 24 A. Correct.</p>	<p>1 Koehler's no-parent-in-the-dugout rule, that there 2 was now a parent in the dugout, that she shouldn't 3 be there. 4 Q. Were other parents complaining that they 5 would have wanted to be in the dugout, also? 6 A. No, they were complaining because they 7 didn't want a parent in the dugout. 8 Q. And because of those complaints, did you 9 ask her to stop being scorekeeper? 10 A. Yes, I did. 11 Q. And who took over that job? 12 A. Our players. 13 Q. The players themselves handled the 14 scorebook? 15 A. Yes. 16 Q. How did April Nace react to that, when 17 you told her that she could no longer be the 18 scorekeeper because of other parents' complaints? 19 A. She was fine. 20 Q. She was okay? 21 A. She just left. 22 Q. Did April Nace attend her daughter's 23 games? 24 A. Every one of them.</p>

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<p>1 Q. How about James Nace?</p> <p>2 A. I don't know that I saw him at games, but</p> <p>3 I don't see a lot of people over there.</p> <p>4 Q. What about after Mr. Romig's arrest? Do</p> <p>5 you recall seeing James Nace at any games after</p> <p>6 October 1st, 2013?</p> <p>7 A. I don't recall seeing him at a game,</p> <p>8 except Senior Night. He was there Senior Night.</p> <p>9 Q. And what is Senior Night?</p> <p>10 A. When seniors are recognized. And Liz,</p> <p>11 being a senior, would have been recognized at our</p> <p>12 Senior Night.</p> <p>13 Q. At the game?</p> <p>14 A. Yes. Her mom and dad were there, too.</p> <p>15 Q. Was there was a banquet at the end of the</p> <p>16 year?</p> <p>17 A. Yes.</p> <p>18 Q. Were the Naces there for that?</p> <p>19 A. I know Liz was there and -- I would bet</p> <p>20 that her mom was there. I don't know about dad.</p> <p>21 Q. Was the banquet just for the girls</p> <p>22 fast-pitch softball team or for all sports?</p> <p>23 A. Just for the fast-pitch softball team.</p> <p>24 Q. Do you know anybody at Faith Christian</p>	<p>1 Q. Do you know Russell Hollenbach at all,</p> <p>2 the athletic director at FCA for a certain period</p> <p>3 of time?</p> <p>4 A. Not personally, just the name.</p> <p>5 Q. Do you know anybody in the Clymer family?</p> <p>6 His father was a principal there, and his son is a....</p> <p>7 principal there.</p> <p>8 A. I know Bob Clymer.</p> <p>9 Q. The father?</p> <p>10 A. The father, I guess; and Ryan is his son,</p> <p>11 who is the headmaster, the principal now.</p> <p>12 Q. How do you know that?</p> <p>13 A. I know Bob Clymer because he was my track</p> <p>14 coach in high school, and I just know the name</p> <p>15 Ryan because I know it's his son.</p> <p>16 Q. Did you ever go to PIAA meetings, rules</p> <p>17 meetings, the annual meeting that they would have</p> <p>18 that athletic directors may attend, or people in</p> <p>19 the athletic department of various schools?</p> <p>20 A. Yes. There is a required coaches meeting</p> <p>21 each spring for softball. Before the beginning of</p> <p>22 the season it's mandatory that each head coach</p> <p>23 attend, so I would attend that meeting.</p> <p>24 Q. Where was that?</p>
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<p>1 Academy?</p> <p>2 A. Does Pastor Paul Auckland have anything</p> <p>3 to do with Faith Christian Academy?</p> <p>4 Q. Sure does.</p> <p>5 A. He was my quarterback when I played high</p> <p>6 school football.</p> <p>7 Q. When you played for...</p> <p>8 A. Pennridge.</p> <p>9 Q. He was the quarterback?</p> <p>10 A. Yes, and I was one of his tackles.</p> <p>11 Q. You protected him.</p> <p>12 A. Correct.</p> <p>13 Q. Do you have any continuing relationship</p> <p>14 with him at all?</p> <p>15 A. Only when we run into each other on the</p> <p>16 street or talk -- see each other at an event or</p> <p>17 something like that.</p> <p>18 Q. Are you a member of Faith Baptist Church?</p> <p>19 A. No.</p> <p>20 Q. Are you a member of any church?</p> <p>21 A. Yes.</p> <p>22 Q. Which church?</p> <p>23 A. St. Paul's United Church of Christ in</p> <p>24 Sellersville.</p>	<p>1 A. Typically it was held at CB South High</p> <p>2 School.</p> <p>3 Q. And were the athletic directors there,</p> <p>4 also?</p> <p>5 A. No.</p> <p>6 Q. Just coaches?</p> <p>7 A. Just coaches and umpires were there.</p> <p>8 Q. What types of things were discussed at</p> <p>9 those?</p> <p>10 A. It was rules interpretation. It was</p> <p>11 basically game stuff.</p> <p>12 Q. Is that it?</p> <p>13 A. That's it.</p> <p>14 Q. Have you ever received any type of</p> <p>15 training or instruction or guidance from the PIAA</p> <p>16 or any governing body regarding the issue of</p> <p>17 sexual abuse or harassment of players by coaches?</p> <p>18 A. No.</p> <p>19 Q. Have you ever sought out any information</p> <p>20 from any source regarding the recognition of</p> <p>21 sexual abuse of players by coaches and the</p> <p>22 reporting of that abuse?</p> <p>23 A. No.</p> <p>24 Q. Do you know an individual named Robin</p>

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